

**EXHIBIT B**

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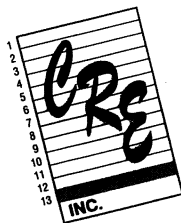
1 EQUAL EMPLOYMENT \* IN THE  
 2 OPPORTUNITY COMMISSION, \* UNITED STATES  
 3 Plaintiff, \* DISTRICT COURT  
 4 vs. \* FOR THE  
 5 WARFIELD-ROHR CASKET \* DISTRICT OF MARYLAND  
 6 COMPANY, INC., \* CIVIL ACTION NUMBER:  
 7 Defendant. \* WMN-01-2872

8 \* \* \* \* \*

9 DEPOSITION OF:

10 WILLIAM HOWARD AYRES,  
 11 was taken on Thursday, March 21, 2002, commencing  
 12 at 9:19 a.m., at the Equal Employment Opportunity  
 13 Commission, 10 South Howard Street, Third Floor,  
 14 Baltimore, Maryland, before Carla J. Briggs, CSR,  
 15 RMR, CRR, Notary Public.

16 \* \* \* \* \*



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1 why did you say that?

2 Was that something that you said out  
3 of anger or is that something that you commonly  
4 said and it really didn't mean anything to you?  
5 Why --

6 A. He probably didn't like the letter.

7 Q. But why did you use that kind of  
8 language --

9 A. That's the way I talk.

10 Q. That's the way you talk?

11 A. Uh-huh.

12 Q. Okay. It wasn't because you were  
13 angry, it's just the way you talk?

14 A. I probably meant to get out if he  
15 didn't like it, because that's the way it was  
16 going to be from now on.

17 Q. Okay. Here it is. April 7th, 2000.  
18 "Howard asked me how old I was and when I was  
19 going to retire." And he made that entry on  
20 April 7, 2000. Do you recall that happening?

21 MR. HIRSCH: Objection.

1 A. I didn't make that.

2 Q. You did not make that?

3 A. No.

4 Q. Earlier I had asked if you said it,  
5 but I didn't give you the date. I didn't give  
6 you the exact date. But he said that happened on  
7 April 7th.

8 A. What did I ask him?

9 MR. HIRSCH: Objection.

10 Q. "He asked me how old I was and when I  
11 was going to retire."

12 A. I knew how old he was.

13 MS. ANDREW: Okay. That's all I have.

14 Do you have any follow-up?

15 MR. HIRSCH: Yes, briefly.

16 EXAMINATION

17 BY MR. HIRSCH:

18 Q. Ms. Andrew just asked you whether or  
19 not you said to Mr. Kuehnl on April 7th or you  
20 asked Mr. Kuehnl on April 7th how old he was, and  
21 I believe your answer was that you did not; is

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1 that correct?

2 A. I did not.

3 Q. Do you remember any time in April of  
4 2000 asking him how old he was or asking him  
5 about his retirement?

6 A. No, I did not.

7 Q. Okay. Ms. Andrew asked you about what  
8 you said to Mr. Kuehn1 when you terminated his  
9 employment.

10 Do you recall at that time telling him  
11 that he was too old?

12 A. No. He wasn't too old.

13 Q. And did you say anything like that to  
14 him?

15 A. No.

16 MR. HIRSCH: No further questions.

17 MS. ANDREW: Okay.

18 THE REPORTER: Do you want him to read  
19 and sign?

20 MR. HIRSCH: Yes.

21 THE REPORTER: And do you want a copy?